

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

UNITED STATES DISTRICT COURT

for the

Northern District of New YorkAlbany DivisionAdam Albright

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

NYS Dep + J Tax + fin.
& LIT & Employ 111 et al

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No.

1:25-cv-925 (AMN/TWD)
 (to be filled in by the Clerk's Office)

Jury Trial: (check one) ☐ Yes ☐ No

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Adam Albright

Street Address

10 Margaret Drive

City and County

Loudonville

State and Zip Code

NY, 12211

Telephone Number

838.280-0622

E-mail Address

Ha 311 AL

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

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Defendant No. 1

Name Department of Tax + Fin. NYS
 Job or Title (if known) Institutional capacity,
 Street Address Bldg 9, State Campus,
 City and County Albany, Albany
 State and Zip Code NY 12227
 Telephone Number
 E-mail Address (if known) Amanda.Hiler@Tax.NY.Gov

Defendant No. 2

Name Ms. Amanda Hiler
 Job or Title (if known) Com. Public Servant Capacity + Individual cap.
 Street Address Bldg 9, State Campus
 City and County Albany, Albany
 State and Zip Code 12227
 Telephone Number
 E-mail Address (if known) Amanda.Hiler@Tax.NY.Gov

Sam # 1

Defendant No. 3

Name Ms. Mary Ellen Landource
 Job or Title (if known) In. official & Personal Capacity,
 Street Address Bldg 9, State campus
 City and County Albany - Albany
 State and Zip Code 12227
 Telephone Number 518.457-2070
 E-mail Address (if known) MaryEllen.Landource@Tax.NY.Gov

Defendant No. 4

Name Mr. Peter Ellis
 Job or Title (if known) Incapacities: Personal + official capacities,
 Street Address Bldg 9, Rm. State campus
 City and County Albany Albany
 State and Zip Code NY 12227
 Telephone Number
 E-mail Address (if known) Peter.Ellis@Tax.NY.Gov

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II. Basis for Jurisdiction

Article III

Infringed Con. Treaty

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

☐

Federal question

☒

Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

Art. III. Enforceable

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, (name) Adam Albright, is a citizen of the State of (name) New York.

b. If the plaintiff is a corporation

The plaintiff, (name) ADAM J. ALBRIGHT, is incorporated under the laws of the State of (name) New York, and has its principal place of business in the State of (name) 10 Margaret Dr. Albany, NY, 12211.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) _____, is a citizen of the State of (name) _____. Or is a citizen of (foreign nation) _____.

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b. If the defendant is a corporation

The defendant, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A Breach of Chain of Command - Authentication of Doc.
- ~~To~~ Tax Payer data Handling - Retaliation.
- Weaponization of Admin + Public Law - Med Evaluation
- Involuntary Med Leave.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

ART III - Equitable Relief:

Halt, stop P. Med. Defamation

Restore the Auditor Rights, Title, Interest

in full capacity, Equitable in STR.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing:

7/15/25

Signature of Plaintiff

Printed Name of Plaintiff

Adam J. Johnson Albright

B. For Attorneys

Date of signing:

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address

- c. Defendant: Mr. Joseph DiGiudicio
Official Position: In: official & Personal Capacities,
Address: Bldg 9 State Campus
Albany, ~~NY~~ Albany
NY 12227
Joseph.DiGiudicio@Tn.NY.Gov
- d. Defendant: Ms. Mreen Wickwire-Wissick
Official Position: In: official & Personal Capacities
Address: Bldg 9 State Campus
Albany, NY 12227
Mreen.wickwire-wissick@Tn.NY.Gov
- e. Defendant: Ms. Maria Matos
Official Position: In: official & Personal Capacities
Address: Bldg 9, State Campus
Albany, NY 12227
Maria.Matos@Tn.NY.Gov
- f. Defendant: Ms. Patricia Gentile
Official Position: In: official & Personal Capacities,
Address: Bldg 9, State Campus
Albany NY 12227
Patricia.Gentile@Tn.NY.Gov

Mr. Joseph D. Dwyer

Refined second - 12/2/2011

State Capital

Andly we find it

20.05.2020

Mr. Wilson (VLC) - 4/22/20

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Brigade of 2nd Cavalry

75551 NW. 12/14

(Handwritten signature)

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7. 5. 2019 Mv, Gaild

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Shirley G. Smith

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13/6/81

7-5-51 PM 2nd/6

[illegible]

- g. Defendant: Ms. Nancy Small Niblock
Official Position: In Personal & Official Capacity
Address: Bldg 9 State Campus
Albany, NY 12227
Nancy.Small.Niblock@Tn.NY.Gov
- h. Defendant: Ms. Lindsay Rayan
Official Position: In Official & Personal Capacity
Address: Bldg 9 State Campus
Albany, NY 12227
Lindsay.Rayan@Tn.NY.Gov
- i. Defendant: Ms. Danielle Jacobson
Official Position: Bldg 9 State Campus Rm
Address: Albany NY 12227
In Personal & Official Capacity
Danielle.Jacobson@Tn.NY.Gov
- j. Defendant: Ms. Rebecca Manning
Official Position: In Official & Personal Capacity
Address: Bldg 9 State Campus
Albany NY 12227
Rebecca.Manning@Tn.NY.Gov

- g. Defendant: Ms. Sarah Niemitalo
Official Position: in official & Personal Capacity
Address: Bldg 9 State Campus
Albany NY 12227
Sarah.Niemitalo@TAX.NY.Gov
- h. Defendant: Mr. Mitchell Baitsholtz
Official Position: in official & Personal Capacity
Address: Bldg 9 State Campus
Albany 12227
Mitchell.Baitsholtz@TAX.NY.Gov
- i. Defendant: Mr. Daniel Pollay
Official Position: in official & Personal Capacity
Address: Bldg 9 Campus
Albany, NY 12227
Daniel.P.Pollay@TAX.NY.Gov
- j. Defendant: Mr. John McCormack
Official Position: in official & Personal Capacity
Address: Bldg 9 State Campus
Albany, NY, 12227
John.McCormack@TAX-NY.Gov